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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

In re Bard IVC Filters Products
Liability Litigation

NO. MD-15-02641-PHX-DGC

**STIPULATION RE PROPOSED CASE
MANAGEMENT ORDER FOR
DISCOVERY PROTOCOLS FOR
DISCOVERY GROUP 1**

In accordance with Case Management Orders Nos. 11 [Doc. 1662], 18 [Doc. 3685], and 19 [Doc. 4311], the Parties submit this stipulation for entry of a proposed Case Management Order regarding a discovery protocols for Discovery Group 1. A copy of the proposed case management order is attached as Exhibit "A".

The parties are separately filing submissions regarding issues in dispute as identified in the attached proposed form of order.

Respectfully submitted this 3rd day of January 2017.

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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of January 2017, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Deborah Yanazzo